

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

IN RE TEXTRON INC. ERISA LITIGATION :
:
v. : Civ. Action No.: 09-383-ML
: (Consolidated Actions)
:
THIS DOCUMENT RELATES TO: :
ALL ACTIONS :
:

**PLAINTIFFS' MOTION FOR: (1) FINAL APPROVAL OF CLASS ACTION
SETTLEMENT; (2) APPROVAL OF PLAN OF ALLOCATION OF SETTLEMENT
PROCEEDS; AND (3) CERTIFICATION OF THE SETTLEMENT CLASS AND CLASS
COUNSEL'S MOTION FOR: (1) AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES AND (2) CASE CONTRIBUTION AWARDS**

Pursuant to Fed. R. Civ. P. 23(e), Plaintiffs Diana Leach, Holly Sheets, Alma I. Perez, and Adrienne Harrington-Wheatley (“Plaintiffs”) respectfully move for final approval of the Settlement of this Action; approval of the Plan of Allocation of the Settlement proceeds and certification of the Settlement Class.¹ Contemporaneously, pursuant to Fed. R. Civ. P. 23(h), Milberg LLP (hereinafter “Class Counsel”) respectfully move for an order granting an award of attorneys’ fees, expense reimbursement and case contribution awards.

The parties in this litigation, following extensive negotiation, reached a settlement providing, *inter alia*, for the payment of \$4.375 million to the Settlement Class (hereinafter described (the “Settlement”) as embodied in the Stipulation. In connection therewith, Class Counsel move for an order:

1. approving the Settlement as fair, reasonable, and adequate;
2. certifying a class under Federal Rule of Civil Procedure 23(b)(1) consisting of all persons who were participants in or beneficiaries of the Textron Savings Plan (the “Plan”) at any time between July 17, 2007 and December 31, 2011, and whose accounts included investments in the Textron Stock Fund.

¹ Unless otherwise defined herein, capitalized terms shall have the same meanings as set forth in the Class Action Settlement Agreement dated August 14, 2013 (the “Settlement Agreement”) (Docket No. 106).

Excluded are Defendants and their Immediate Family Members, any entity in which a Defendant has a controlling interest, and their heirs, Successors-in-Interest, or assigns (in their capacities as heirs, Successors-in-Interest, or assigns).

3. approving the proposed Plan of Allocation;
4. certifying the Settlement Class;
5. approving the application for attorneys' fees and expenses pursuant to Fed. R. Civ. P. 23(h); and
6. approving case contribution awards to the Plaintiffs

The proposed Settlement confers a substantial benefit on the class as detailed in the accompanying Declaration of Jennifer J. Sosa and Memorandum of Law, and merits the Court's approval.

WHEREFORE, for the reasons set forth above, this Court should enter the [PROPOSED] ORDER AND FINAL JUDGMENT, filed with Court on August 14, 2013 (Docket No. 106-1).

Dated: November 6, 2013

Respectfully submitted,

s/ Vincent L. Greene IV
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Class Counsel for Plaintiffs and the Proposed Class

Certificate of Service

I certify that a true copy of the foregoing was served electronically via the CM/ECF system on all counsel of record on this 6th day of November, 2013.

/s/ Vincent L. Greene